

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION  
Civil Action No.: 2:24-cv-993-RMG**

\_\_\_\_\_  
BASF CORPORATION )

v. )

AIU INSURANCE COMPANY ET AL )  
\_\_\_\_\_

**DEFENDANT ALLSTATE INSURANCE COMPANY’S  
NOTICE OF MOTION AND MOTION TO DISMISS**

PLEASE TAKE NOTICE that Defendant, Allstate Insurance Company (“Allstate”), solely as successor-in-interest to Northbrook Excess and Surplus Insurance Company, formerly Northbrook Insurance Company (“Northbrook”), hereby moves this Court, pursuant to Federal Rules of Civil Procedure, Rules 12(b)(1), (2), (6), and (7), and S.C. Code Ann. § 15-5-150, for an order dismissing this action in its entirety. The motion is based on this notice and the accompanying memorandum of law, and the Affidavit of Stefano Calogero and accompanying exhibits thereto.

PLEASE ALSO TAKE NOTICE that pursuant to Local Rule of Civil Procedure 7.02, Counsel states that this motion is specifically excluded from Rule 7.02 as it is a Motion to Dismiss. *See* Local Civ. Rule 7.02 (D.S.C.).

Dated: April 24, 2024

**HAMILTON STEPHENS  
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